

1 A. Eric Bjorgum (State Bar No. 198392)
2 Marc A. Karish (State Bar No. 205440)
3 KARISH & BJORGUM, PC
4 119 E. Union St., Suite B
5 Pasadena, California 91103
6 Telephone: (213) 785-8070
7 Facsimile: (213) 995-5010
8 E-Mail: eric.bjorgum@kb-ip.com

9 Attorneys for Plaintiff

10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA
12 WESTERN DIVISION

13 PCR DISTRIBUTING CO., a company
14 organized under the laws of California,

15 vs.

16 JOHN DOES 1 - 20 d/b/a,
17 NHENTAI.NET

18 Defendants.

Case No.: 2:24-cv-07453- FLA-AJR

**PLAINTIFF PCR DISTRIBUTING
CO.'S MOTION FOR EARLY
DISCOVERY**

Date: October 4, 2024

Time: 1:30 p.m.

Place: First Street Courthouse
350 W. 1st Street
Courtroom 6B, 6th Floor
Los Angeles, California 90012

Judge: Hon. Fernando L. Aenlle-Rocha

22 I, A. Eric Bjorgum, under penalty of perjury, declare and state as follows:

23 1. I am an attorney at law licensed to practice before the state and federal
24 Courts in the State of California. I am a principal attorney with the Karish &
25 Bjorgum, PC, attorneys for Plaintiff PCR Distributing Company. Unless otherwise
26

1 stated, I have personal knowledge of the facts contained herein in this declaration
2 and, if called and sworn as a witness, could and would competently testify thereto.

3 2. I have sent emails to the following vendors associated with
4 nHentai.net: (1) Namecheap, Inc. (2) Cloudflare, Inc., and (3) Lanoto Solutions Inc.
5 I asked each one if it would honor my request for information about nHentai.net
6 without a subpoena. Only Namecheap responded, and it claimed that it was not the
7 registrar for nHentai.net. However, it was the registrar when this action was filed
8 in August 20, 2024.

9 3. In previous litigation, I have had direct contact with Cloudflare, Inc.
10 regarding the production of information without a subpoena. They previously
11 indicated that they would comply with a subpoena seeking information about their
12 customers who are accused of copyright infringement (and have done so) but that
13 they would not produce any information without a subpoena.

14
15 I declare under the penalty of perjury under the laws of the United States of
16 America that the foregoing is true and correct.

17
18 Execute on the 6th day of September 2024 at Pasadena, California.

19
20
21 /s/ A. Eric Bjorgum
22 A. Eric Bjorgum